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\*ADMITTED IN DC ONLY

February 27, 2019

Re: *In re Foreign Exchange Benchmark Rates Antitrust  
Litigation*, Case No. 1:13-cv-07789-LGS

Dear Judge Schofield:

We write in response to Plaintiffs' February 21, February 22, February 25, and February 26 letters to the Court requesting permission to file redacted versions of Plaintiffs' Motions for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas of Mr. Richard Usher, Mr. James Michael Anthony Wynne, Mr. Christopher Ashton, Mr. Matthew Gardiner, Mr. Ian Drysdale, Mr. Gordon Andrew, and Mr. Paul Nash ("Plaintiffs' Hague Requests").


As the Court is aware, the parties are continuing to negotiate a Proposed Deposition Protocol with all parties in the related actions.<sup>1</sup> See ECF No. 1147 (ordering that a Proposed Deposition Protocol be filed with the Court within 60 days of the Court's December 20, 2018 Order); ECF No. 1187 (granting extension of time for filing a Proposed Deposition Protocol Order from February 19, 2019 to March 4, 2019). In light of these continued negotiations, the coordination benefits that may arise from the Proposed Deposition Protocol, and in an effort to avoid duplicative Hague requests and imposing undue burden on foreign witnesses and the foreign courts, Credit Suisse respectfully requests that the Court hold such motions in abeyance pending the Parties' submission of the Proposed Deposition Protocol.

<sup>1</sup> *Nypl, et al. v. JPMorgan Chase & Co., et al.*, 15-cv-09300; *Contant et al. v. Bank of Am. Corp., et al.*, 17-cv-3139; and *Allianz Global Investors GMBH, et al. v. Bank of Am. Corp., et al.*, 18-cv-10364.

CAHILL GORDON & REINDEL LLP

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Respectfully submitted,

*David Januszewski* 

David Januszewski

Honorable Lorna G. Schofield  
U.S. District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

VIA ECF

cc: All Counsel (via ECF)